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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**MAHMOUD KHALIL,**

Plaintiff,

**v.**

**WILLIAM JOYCE ET AL.,**

Respondent.

Case No. 2:25-cv-01963  
(MEF)(MAH)

**CERTIFICATION OF TYLER  
TAKEMOTO IN SUPPORT OF  
APPLICATION FOR ADMISSION  
PRO HAC VICE PURSUANT TO  
LOCAL CIVIL RULE 101.1**

I, Tyler Takemoto, hereby certify the following:

1. I am an attorney at the American Civil Liberties Union Foundation (“ACLU”). I have been requested to represent Plaintiff in this matter.

2. I am a member in good standing of the District of Columbia as of 2022.

3. I am also admitted to practice before the following courts:

Court	Year of Admission	Attorney Rolls Maintained By:
District of Columbia	2022	The District of Columbia Bar 901 4th Street, NW Washington, D.C. 20001
U.S. Court of Appeals for the First Circuit	2024	John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 2500 Boston, MA 02210

4. No professional disciplinary proceedings are pending against me in any jurisdiction and no professional discipline has previously been imposed on me in any jurisdiction.

5. In the event I am admitted *pro hac vice*, I agree to:

- a. Make payment to the New Jersey Lawyer's Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) for each year in which I represent Plaintiff in this matter;
- b. Abide by the Rules of this Court, including any relevant disciplinary rules;

- c. Notify this Court immediately of any matters affecting my standing at the Bar of any other Court; and
  - d. Have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in the United States District Court for the District of New Jersey.
6. In view of the foregoing, I respectfully request that I be admitted *pro hac vice*.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: March 21, 2025

Respectfully Submitted,  
/s/Tyler Takemoto  
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